

**UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS**

DONALD BACHAND,
Plaintiff

V.

SAM & BEN FISHERIES, INC.,
Defendant

)
)
)
) **Civil Action**

)
) **No. 04-12221-PBS**
)
)
)

**PLAINTIFF'S MOTION TO COMPEL FURTHER ANSWERS TO PLAINTIFF'S
INTERROGATORIES**

Now comes the Plaintiff in the above entitled action and by and through his attorney submits Plaintiff's Motion to Compel further Answers to Plaintiff's Interrogatories.

As grounds Plaintiff relies on his memorandum of law filed herewith.

WHEREFORE, Plaintiff requests that this Honorable Court order Defendant to answer Interrogatory #14-22, that Attorney Langer's pro hac vice status be revoked and that this Honorable Court order Defendant to pay costs associated with Plaintiff filing this Motion.

Respectfully submitted for the Plaintiff,
DONALD BACHAND, by his attorney,

/s/ Carolyn M. Latti
/s/ Carolyn M. Latti, BBO# 567394
Latti & Anderson LLP
30-31 Union Wharf
Boston, MA 02109
(617) 523-1000

Dated: February 8, 2005